

EXHIBIT 18

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ELLEN GERHART, ELISE	:	
GERHART, ALEX LOTORTO	:	
and ELIZABETH GLUNT,	:	
Plaintiffs and	:	CIVIL ACTION NO. 1:17-cv-1726-YK
Counterclaim Defendant	:	
	:	
v.	:	
	:	
ENERGY TRANSFER	:	
PARTNERS, <i>et al.</i> ,	:	(Judge Kane)
Defendants and	:	
Counterclaimants	:	

**PLAINTIFFS' AMENDED THIRD SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT
TIGERSWAN**

TO: Frank J. Lavery, Jr. Esq.
Elizabeth L. Kramer, Esq.
Lavery Law
225 Market Street, Suite 304
P.O. Box 1245
Harrisburg, PA 17108

DEFINITIONS AND INSTRUCTIONS

These requests incorporate by reference the definitions set forth in Plaintiff's First Set of Requests for Production of Documents directed to you. The word "TigerSwan" includes the business entity and any employee, director, and/or officer thereof.

REQUESTS

1. A copy of the “whatsapp” conversation for which a link is included at “DF TigerSwan 1938.”
2. Copies of all emails sent from or received by the following accounts containing any single or combination of the following search terms: Gerhart, Gerharts, Elise, Ellen, Camp White Pine, anarchist, anarchists, anarchism, Huntingdon, Robert Angelo; Angelo; Roberto Bricchi; Bricchi; PA Progress; Badger.
 - a. n.johnson@tigerswan.com;
 - b. r.rice@tigerswan.com;
 - c. r2@tigerswan.com;
 - d. The email alias “Nate Netizen” appearing on DF TigerSwan1871.
3. Any document that supports your averments set forth in paragraphs 150, 158, 161, and 222 of your Answer.
4. Any private detective or private investigator license issued by Pennsylvania for the individual identified as “ASH” on DF TigerSwan 200-201.
5. Any private detective or private investigator license issued by Pennsylvania for the female described by Nik McKinnon in his April 12, 2022 deposition who provided “human intelligence” by entering the Gerhart property at TigerSwan’s direction.
6. Any document, in effect in the year (but not necessarily limited to) 2017, which you contend refutes, or upon which you may rely at trial to refute, the allegations that TigerSwan required, directed, supervised, oversaw, reviewed, approved, was connected to benefitted from, coordinated, or discussed with Nick Johnson the posts Johnson made to the PA Progress Facebook page.
7. Any document, in effect in the year (but not necessarily limited to) 2017, and not produced or identified pursuant to the immediately preceding request, that sets forth the legal rights and responsibilities – including, but

not limited to, compensation paid to Nick Johnson, use by Nick Johnson of TigerSwan property, the time period of any agreement, services to be provided to TigerSwan by Nick Johnson - between you and Nick Johnson.

8. Any document sent by you to, or received by you from, Energy Transfer Partners, Sunoco Pipeline, and/or Sunoco Logistics pertaining to the PA Progress Facebook page in the year 2017.

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/s/ CHRISTOPHER MARKOS

Christopher Markos, Esquire
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Suite 1510
Philadelphia, PA 19107
(215) 557-0099

Attorney for Plaintiffs

Dated: April 13, 2022

CERTIFICATE OF SERVICE

I, Christopher Markos, certify that on the below date I served the foregoing document on all counsel of record via email.

/s/ CHRISTOPHER MARKOS

Christopher Markos, Esq.

Attorney for Plaintiffs

Dated: April 13, 2022